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8 Attorneys for United States of America

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, ) No. CR 16-00440 WHA  
14 Plaintiff, )  
15 v. ) STIPULATION AND ~~PROPOSED~~ ORDER  
ADJUSTING CERTAIN PRETRIAL FILING  
16 DATES )  
17 YEVGENIY ALEXANDROVICH NIKULIN, ) Trial: March 9, 2020  
Defendant. ) Pretrial Conference: February 26, 2020  
18 ) Time: 2:00 p.m.  
19 ) Courtroom No. 12

20 Defendant Yevgeniy Nikulin, represented by appointed counsel Adam Gasner and Valery  
21 Nechay, and the United States, represented by Assistant United States Attorney Michelle J. Kane,  
22 hereby stipulate to the following:

- 23 1. The Court has set the trial of this matter to begin March 9, 2020;  
24 2. On September 17, 2019, the Court approved the parties' proposed pretrial schedule (ECF  
25 No. 118);  
26 3. Based on discussions among the parties, and in order to allow full and adequate pretrial  
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28 STIPULATION & ~~PROPOSED~~ ORDER  
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disclosures, the parties have agreed to adjust the deadline for government expert disclosures, exhibit and witness lists to December 4, 2019. The parties have also agreed to adjust the deadline for Fed. R. Crim. P. 16 defense reciprocal disclosures, including expert disclosures, and Fed. R. Crim. P. 12.1 and 12.2 defense notices to January 15, 2019;

4. The new dates will not affect the other scheduled pretrial dates nor will they affect the trial schedule.

IT IS SO STIPULATED.

DATED: November 19, 2019

DAVID L. ANDERSON  
United States Attorney

/s/  
MICHELLE J. KANE  
Assistant United States Attorney


/s/  
ADAM GASNER  
Counsel for Yevgeniy Alexandrovich  
Nikulin

/s/  
VALERY NECHAY  
Counsel for Yevgeniy Alexandrovich  
Nikulin

**ORDER**

IT IS SO ORDERED.

Dated: November 19, 2019.

  
HON. WILLIAM ALSUP  
United States District Judge